

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA

v.

SHAMOON RAFIQ,

Defendant.

**Affirmation in Support of  
Application for Order of  
Continuance**

20 Mag. 9076

State of New York )  
County of New York : ss.:  
Southern District of New York )

Jared Lenow, pursuant to Title 28, United States Code, Section 1746, hereby declares under penalty of perjury:

1. I am an Assistant United States Attorney in the Office of Damian Williams, United States Attorney for the Southern District of New York. I submit this affirmation in support of an application for an order of continuance of the time within which a preliminary hearing would have to be conducted or an indictment or information would have to be filed, pursuant to Rule 5.1(d) of the Federal Rules of Criminal Procedure and 18 U.S.C. § 3161(h)(7)(A).

2. The defendant was charged in a complaint dated August 25, 2020, with violations of 18 U.S.C. §§ 1343, 1028A & 2; 15 U.S.C. §§ 78j(b) & 78ff; and 17 C.F.R. § 240.10b-5. The defendant was extradited to the United States on or about January 11, 2024, and was presented in this District before a Magistrate Judge on or about January 12, 2024, at which proceeding the defendant was represented by Florian Miedel, Esq., and ordered detained.

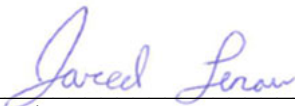
3. At the presentment on January 12, 2024, a preliminary hearing was scheduled for February 12, 2024. Under the Speedy Trial Act, the Government has until on or about that date within which to file an indictment or information. *See* 18 U.S.C. § 3161(b).

5. Defense counsel and I have had discussions regarding a possible disposition of this case. The parties plan to continue our discussions, but do not anticipate a resolution before February 12, 2024.

6. Therefore, the Government requests a 30-day continuance until March 13, 2024, to continue the foregoing discussions toward resolving this matter. On or about February 7, 2024, I personally corresponded with defense counsel, who stated that the defendant consents to an extension of the preliminary hearing and Speedy Trial Act deadlines to March 13, 2024, and has specifically consented to this request.

7. For the reasons stated above, good cause supports the extension of the preliminary hearing deadline, and the ends of justice served by the granting of the requested continuance outweigh the best interests of the public and defendant in a speedy trial.

Dated: New York, New York  
February 8, 2024

  
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Jared Lenow  
Assistant United States Attorney  
212-637-1068